

Shipping & International Trade

Singapore to Impose Sanctions on Russia

Introduction

On 28 February 2022, the Minister for Foreign Affairs, Mr Vivian Balakrishnan, issued a Ministerial Statement in Parliament stating that Singapore intends to impose sanctions and restrictions against Russia (available [here](#)). The potential imposition of country-based sanctions against Russia, in the absence of any underlying United Nations Security Council resolution, is an unprecedented step in the implementation of Singapore's foreign policy.

Scope of Prospective Sanctions

While we await the issuance of the relevant primary and/or subsidiary legislation, the Ministerial Statement suggests that Singapore's prospective sanctions may mirror, to some degree, recent sanctions issued by the United States, the European Union, the United Kingdom, and Japan. There is some uncertainty in this regard given that each sanctions regime differs from jurisdiction to jurisdiction.

Nonetheless, the Ministerial Statement also suggests that such prospective sanctions will include blocking certain Russian banks and financial transactions connected to Russia, as well as export controls on items that could be used as weapons against the people of Ukraine.

Additionally, the prospective sanctions may also potentially include the imposition of asset freezes, and/or a prohibition on making funds available to or for the benefit of certain individuals or entities. There is also the possibility that any prospective sanctions will mirror the language of any United Nations General Assembly ("UN GA") resolution, pending the outcome of the UN GA debate later tonight (28 February 2022, Singapore time).

Concluding Remarks

In light of the Ministerial Statement, banks and other participants in the energy, shipping, defence, and private wealth sectors would be well-advised to identify and ascertain whether there are any live or upcoming transactions with any links with Russia. Such links could include, without limitation, letters of credit issued or confirmed by Russian banks, as well as transactions involving Russian counterparties and ports. This is particularly since it is not clear whether any sanctions, when imposed by the Singapore Government, will have any winding-down period before they take effect.

We will continue to monitor developments and will provide further updates once the relevant legislation has been enacted.

Shipping & International Trade

For more information on the proposed sanctions and how your business might be affected by it, please feel free to approach our team below.

Contacts



Toh Kian Sing, SC
Senior Partner, Dispute
Resolution
Head, Shipping & International
Trade

T +65 6232 0614

kian.sing.toh@rajahtann.com



V Bala
Partner, Shipping &
International Trade

T +65 6232 0383

bala@rajahtann.com



Nathanael Lin
Partner, Shipping &
International Trade

T +65 6232 0293

nathanael.lin@rajahtann.com

Please feel free to also contact Knowledge and Risk Management at eOASIS@rajahtann.com

Our Regional Contacts

RAJAH & TANN | *Singapore*

Rajah & Tann Singapore LLP

T +65 6535 3600
sg.rajahtannasia.com

R&T SOK & HENG | *Cambodia*

R&T Sok & Heng Law Office

T +855 23 963 112 / 113
F +855 23 963 116
kh.rajahtannasia.com

RAJAH & TANN 立杰上海

SHANGHAI REPRESENTATIVE OFFICE | *China*

Rajah & Tann Singapore LLP Shanghai Representative Office

T +86 21 6120 8818
F +86 21 6120 8820
cn.rajahtannasia.com

ASSEGAF HAMZAH & PARTNERS | *Indonesia*

Assegaf Hamzah & Partners

Jakarta Office

T +62 21 2555 7800
F +62 21 2555 7899

Surabaya Office

T +62 31 5116 4550
F +62 31 5116 4560
www.ahp.co.id

RAJAH & TANN | *Lao PDR*

Rajah & Tann (Laos) Co., Ltd.

T +856 21 454 239
F +856 21 285 261
la.rajahtannasia.com

CHRISTOPHER & LEE ONG | *Malaysia*

Christopher & Lee Ong

T +60 3 2273 1919
F +60 3 2273 8310
www.christopherleeong.com

RAJAH & TANN | *Myanmar*

Rajah & Tann Myanmar Company Limited

T +95 1 9345 343 / +95 1 9345 346
F +95 1 9345 348
mm.rajahtannasia.com

GATMAYTAN YAP PATACSIL

GUTIERREZ & PROTACIO (C&G LAW) | *Philippines*

Gatmaytan Yap Patacsil Gutierrez & Protacio (C&G Law)

T +632 8894 0377 to 79 / +632 8894 4931 to 32
F +632 8552 1977 to 78
www.cagatlaw.com

RAJAH & TANN | *Thailand*

R&T Asia (Thailand) Limited

T +66 2 656 1991
F +66 2 656 0833
th.rajahtannasia.com

RAJAH & TANN LCT LAWYERS | *Vietnam*

Rajah & Tann LCT Lawyers

Ho Chi Minh City Office

T +84 28 3821 2382 / +84 28 3821 2673
F +84 28 3520 8206

Hanoi Office

T +84 24 3267 6127
F +84 24 3267 6128
www.rajahtannlct.com

Rajah & Tann Asia is a network of legal practices based in Asia.

Member firms are independently constituted and regulated in accordance with relevant local legal requirements. Services provided by a member firm are governed by the terms of engagement between the member firm and the client.

This update is solely intended to provide general information and does not provide any advice or create any relationship, whether legally binding or otherwise. Rajah & Tann Asia and its member firms do not accept, and fully disclaim, responsibility for any loss or damage which may result from accessing or relying on this update.

Our Regional Presence



Rajah & Tann Singapore LLP is one of the largest full-service law firms in Singapore, providing high quality advice to an impressive list of clients. We place strong emphasis on promptness, accessibility and reliability in dealing with clients. At the same time, the firm strives towards a practical yet creative approach in dealing with business and commercial problems. As the Singapore member firm of the Lex Mundi Network, we are able to offer access to excellent legal expertise in more than 100 countries.

Rajah & Tann Singapore LLP is part of Rajah & Tann Asia, a network of local law firms in Cambodia, China, Indonesia, Lao PDR, Malaysia, Myanmar, the Philippines, Singapore, Thailand and Vietnam. Our Asian network also includes regional desks focused on Brunei, Japan and South Asia.

The contents of this Update are owned by Rajah & Tann Singapore LLP and subject to copyright protection under the laws of Singapore and, through international treaties, other countries. No part of this Update may be reproduced, licensed, sold, published, transmitted, modified, adapted, publicly displayed, broadcast (including storage in any medium by electronic means whether or not transiently for any purpose save as permitted herein) without the prior written permission of Rajah & Tann Singapore LLP.

Please note also that whilst the information in this Update is correct to the best of our knowledge and belief at the time of writing, it is only intended to provide a general guide to the subject matter and should not be treated as a substitute for specific professional advice for any particular course of action as such information may not suit your specific business and operational requirements. It is to your advantage to seek legal advice for your specific situation. In this regard, you may call the lawyer you normally deal with in Rajah & Tann Singapore LLP or email Knowledge & Risk Management at eOASIS@rajahtann.com.